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February 7, 2017

Marianne Mannix
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U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Federal Register, Vol. 80, No. 186; September 25, 2015 (Page 57812-57816)
Preliminary Human Health and Ecological Risk Assessments for Tribufos
EPA-HQ-OPP-2008-0883

Dear Ms. Mannix,

On February 22, 2016, AMVAC submitted formal comments to EPA and the docket in response to EPA's Preliminary Risk Assessment for tribufos (EPA-HQ-OPP-2008-0883). In those comments we mentioned additional information we would be providing. With this submission, AMVAC is providing an additional document as part of our response for tribufos:

-Refined Aquatic Ecological Risk Assessment for Tribufos

This document provides for a further refinement of the ecological risk assessment (ERA) that the Agency issued in their September 3, 2015 memorandum titled "*Transmittal of the Preliminary Environmental Fate and Ecological Risk Assessment for the Registration Review of the Organophosphate Tribufos*". Our study utilized the average application rate as supplied by EPA, refining the aerobic soil metabolism half-life through the use of dissipation study data and redefining the drift fraction. Under this assessment, all acute and chronic RQ's for fish and aquatic invertebrates fell below the LOC. Refinements also provided for PCA and PTA that further reduced exposure. Aquatic plants met the LOC targets even without refinement.

AMVAC appreciates the opportunity to provide these comments and additional information to the Agency. If there are any questions or issues with this response, I can be reached at (949) 221-6144 or via email at ChrisD@amvac-chemical.com.

Sincerely,

Christopher Davis, Regulatory Product Manager
AMVAC Chemical Corporation

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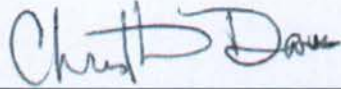


TRANSMITTAL DOCUMENT

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Regulatory Action in Support of Which this Package is Submitted:

Submission of Preliminary Risk Assessment Response for Terbufos

Submission Date:

February 7, 2017

List of Submitted Studies:

Volume 1 (of 1)

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"Refined Aquatic Ecological Risk Assessment for Tribufos", D.
Freedlander, January 30, 2017, Report# 710-REV-020, Guideline
870.3465, 49 pages

